



GREENSBORO URBAN AREA Metropolitan Planning Organization

Conformity Determination Report

2004-2010 Metropolitan Transportation Improvement Program

Final Document

June 25, 2003

PREPARED BY:

The Statewide Planning Branch of the North Carolina Department of Transportation in cooperation with the Greensboro Urban Area Metropolitan Planning Organization.

1.0 Introduction

The purpose of report is to document compliance with the provisions of the Clean Air Act Amendments of 1990 (CAAA) and the Transportation Equity Act for the 21st Century (TEA-21). The conformity determination for the 2004 – 2010 Metropolitan Transportation Improvement Program (MTIP) is based on a regional emissions analysis that utilizes the transportation network approved by the Greensboro Urban Area Metropolitan Planning Organization (MPO) for the 2025 Long Range Transportation Plan (LRTP) and the emissions factors developed by the North Carolina Department of Environment and Natural Resources (NCDENR). All regionally significant federally funded projects in areas designated by the United States Environmental Protection Agency (USEPA) as air quality non-attainment or maintenance must come from a conforming LRTP and MTIP. The U.S. Code of Federal Regulations Section 40, Part 93.104(b)(4) (Appendix A) requires that the MPO make a conformity determination on an existing MTIP within six months of making a conformity determination on a new LRTP unless the new LRTP merely adds or deletes exempt projects. The intent of this report is to document the conformity determination for the existing Greensboro Urban Area 2004 – 2010 MTIP. In addition, the United States Department of Transportation (USDOT), specifically, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), must make a conformity determination on the LRTP and MTIP in all non-attainment and maintenance areas.

The MTIP for Fiscal Years 2004 - 2010, developed by the Greensboro Urban Area and adopted by the MPO on June 25, 2003 is a subset of the conforming 2025 LRTP, as documented in this report.

2.0 Relationship of the LRTP and MTIP

In accordance with 40 CFR Parts 51 and 93, no further regional emissions analysis is required for the Transportation Improvement Program if the MTIP is a subset of the LRTP and if the following conditions are met:

- The MTIP is consistent with the conforming LRTP such that the regional emissions analysis performed on the LRTP applies to the MTIP;
- The MTIP contains all projects which must be started in the MTIP's timeframe to implement the highway and transit system envisioned by the LRTP in each of its horizon years;
- All MTIP projects which are regionally significant are part of the specific highway or transit system envisioned in the LRTP's horizon years; and
- The design, concept, and scope of each regionally significant project identified in the MTIP is not significantly different from that described in the LRTP.

This report documents that the Transportation Improvement Program for Fiscal Years 2004-2010 is a subset of the 2025 LRTP for the Greensboro Urban Area. The 2025 LRTP for the Greensboro Urban Area is fiscally constrained and is consistent with 23 CFR Part 450 Subpart C. This conformity determination is based on the most recent estimates of the emissions and the most recent planning assumptions (including population, employment, travel and congestion estimates available) as determined by the MPO. It has been demonstrated in the Conformity Determination Report, that the Greensboro Urban Area Metropolitan Area 2025 LRTP, approved by the USDOT on October 1, 1999, conforms with the provision of the Clean Air Act Amendments of 1990 and the Intermodal Surface Transportation Efficiency Act of 1991. Also, this LRTP conforms to the purpose of the State Implementation Plan (SIP) for Guilford County. As a subset of this conforming LRTP, no further regional emissions analysis (emissions budget comparison) is required for adoption of this MTIP.

The Greensboro Urban Area Transportation Advisory Committee (TAC), as the decision making body of the Greensboro Urban Area MPO, finds that the FY 2004-2010 MTIP is a subset of the 2025 LRTP for the Greensboro Metropolitan Area, meets the required conditions, and thus conforms to the purpose of the SIP for maintenance of the National Ambient Air Quality Standards (NAAQS).

A copy of the resolution adopting the 2004-2010 Greensboro Urban Area MPO MTIP and finding it conforming is attached as Appendix B. A copy of the 2004-2010 MTIP is attached to this report as Appendix D.

3.0 Latest Planning Assumptions

The planning assumptions used to develop the Conformity Determination Report are the latest planning assumptions approved by the Greensboro Urban Area MPO. Estimates of future population and employment are five years old or less. The vehicle age distribution and fleet mix distributions used as inputs to the emissions model were based on the current data from North Carolina Division of Motor Vehicles. These data are also less than five years old.

4.0 Interagency Consultation

The 2004-2010 Greensboro Urban Area MTIP has undergone interagency consultation as required in the North Carolina Administrative Code Title 15A Subpart 2D 2002 - 2003 inclusive. An interagency consultation meeting involving the Greensboro Urban Area MPO, NCDOT, NCDENR, FHWA, FTA, and EPA- Region 4 was held on April 7, 2003. A summary of issues raised and responses thereto, along with any written agency comments, is attached in Appendix C.

5.0 Public Involvement

The MTIP was made available for review by the public in accordance with the Greensboro Urban Area's public involvement policy. Copies of citizen comments and agency responses to them are included in the text of the MTIP document, attached as Appendix D.

6.0 Finding of Conformity

The Greensboro Urban Area TAC, as the decision making body of the Greensboro Urban Area MPO, finds that the FY 2004-2010 MTIP is a subset of the 2025 LRTP for the Greensboro Urban Area MPO Metropolitan Area. The MTIP meets the conditions described earlier in this document and thus conforms to the purpose of the SIP for maintenance of the National Ambient Air Quality Standards (NAAQS).

A copy of the resolution adopting the 2004-2010 Greensboro Urban Area MPO MTIP, and finding it conforming, is attached as Appendix B.

Appendix A

40 CFR § 93.122 (e)

(e) *Reliance on previous regional emissions analysis.* (1) The TIP may be demonstrated to satisfy the requirements of § 93.118 (Motor vehicle emissions budget) or 93.119 (Emission reductions in areas without motor vehicle emissions budgets) without new regional emissions analysis if the regional emissions analysis already performed for the plan also applies to the TIP. This requires a demonstration that:

- (i) The TIP contains all projects which must be started in the TIP's timeframe in order to achieve the highway and transit system envisioned by the transportation plan;
- (ii) All TIP projects which are regionally significant are included in the transportation plan with design concept and scope adequate to determine their contribution to the transportation plan's regional emissions at the time of the transportation plan's conformity determination; and
- (iii) The design concept and scope of each regionally significant project in the TIP is not significantly different from that described in the transportation plan.

(2) A project which is not from a conforming transportation plan and a conforming TIP may be demonstrated to satisfy the requirements of Sec. 93.118 or Sec. 93.119 without additional regional emissions analysis if allocating funds to the project will not delay the implementation of projects in the transportation plan or TIP which are necessary to achieve the highway and transit system envisioned by the transportation plan, and if the project is either:

- (i) Not regionally significant; or
- (ii) Included in the conforming transportation plan (even if it is not specifically included in the latest conforming TIP) with design concept and scope adequate to determine its contribution to the transportation plan's regional emissions at the time of the transportation plan's conformity determination, and the design concept and scope of the project is not significantly different from that described in the transportation plan.

40 CFR § 93.104 (b)(4)

(4) After an MPO adopts a new or revised transportation plan, conformity of the TIP must be redetermined by the MPO and DOT within six months from the date of DOT's conformity determination for the transportation plan, unless the new or revised plan merely adds or deletes exempt projects listed in Sections 93.126 and 93.127. Otherwise, the existing conformity determination for the TIP will lapse.

Appendix B

RESOLUTION FINDING THE GREENSBORO URBAN AREA METROPOLITAN TRANSPORTATION IMPROVEMENT PROGRAM FOR FY 2004 - 2010 IN CONFORMITY WITH THE NORTH CAROLINA STATE IMPLEMENTATION PLAN

A motion was made by TAC Member Bob Landreth and seconded by TAC Member Robbie Perkins for adoption of the following resolution, and upon being put to a vote was duly adopted.

WHEREAS, the Transportation Advisory Committee is the duly recognized transportation decision making body for the 3-C transportation planning process of the Greensboro Urban Area Metropolitan Planning Organization; and

WHEREAS, the United States Environmental Protection Agency redesignated Guilford County as a maintenance area for ozone on July 5, 1995; and

WHEREAS, that conformity determination used the latest planning assumptions approved by the Greensboro Urban Area Metropolitan Planning Organization; and

WHEREAS, that conformity determination used the latest emissions model approved by the United States Environmental Protection Agency; and

WHEREAS, there are no transportation control measures listed in North Carolina's State Implementation Plan; and

WHEREAS, that conformity determination was made according to the established interagency consultation procedures for North Carolina; and

WHEREAS, the programs and projects included in the Greensboro Urban Area Long Range Transportation Plan are consistent with the North Carolina State Implementation Plan's emissions budgets for the Greensboro Urban Area based on an emissions analysis dated June, 2001; and

WHEREAS, the programs and projects included in the Greensboro Urban Area Metropolitan Transportation Improvement Program for FY 2004 - 2010 are financially constrained in accordance with State and Federal law; and

WHEREAS, the programs and projects included in the Greensboro Urban Area Metropolitan Transportation Improvement Program for FY 2004– 2010 are a subset of the conforming Greensboro Urban Area Long Range Transportation Plan.

NOW, THEREFORE be it resolved, by the Greensboro Urban Area Transportation Advisory Committee, that the Metropolitan Transportation Improvement Program for FY 2004 - 2010 conforms to the intent of the North Carolina State Implementation Plan in accordance with the Clean Air Act as Amended, on this, the 25th day of June, 2003.

I, Sandy Carmany, TAC Chair
(Name of Certifying Official) (Title of Certifying Official)

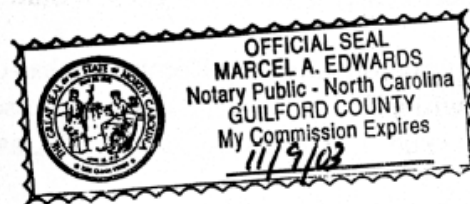
do hereby certify that the above is a true and correct copy of an excerpt from the minutes of a meeting of the Greensboro Urban Area TAC duly held on this, the 25th day of June, 2003.

Sandy Carmany
Chair, Transportation Advisory Committee

Subscribed and sworn to me this, the 25th day of June, 2003.

Marcel A. Edwards
Notary Public

My commission expires 11/9/03.



Appendix C

Form FHWA-201
(Rev. 11-67)

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

Use this form in lieu of transmittal slips within Dept. of Trans. when message comment is to be retained as file material. Do not prepare carbons. Not to be used in lieu of form FHWA-121 for informal correspondence

MINUTE - MEMO

Subject: 2004-2010 MTIP Conformity Interagency Consultation Meeting 4/7/03

TO	MESSAGE/COMMENT	FROM/DATE
Eddie Dancausse (FHWA NC Division), Loretta Barren (FHWA NC Division), Marcus Wilner (FHWA NC Division), Kevin Rose (FHWA), Alex McNeil (FTA), Kelly Sheckler (EPA), Behshad Norowzi (NCDOT), Van Argabright (NCDOT), James Upchurch (NCDOT), Alena Cook (NCDOT), Mike Kozak (NCDOT), Tamara Shaw (NCDOT), Anson Gock (NCDOT), Ray McIntyre (NCDOT), David Hyder (NCDOT), Terry Arellano (NCDOT), Kimberly Drew Hinton (NCDOT), Jerry Dudeck (NCDOT), Heather Hildebrant (NCDENR), Kenneth Withrow (CAMPO), Andy Grzymski (High Point MPO), Jeff Sovich (Greensboro MPO), Wendy Miller (Winston-Salem MPO), Gregg Errett (Winston-Salem Forsyth MPO), Patrick Reagan (Winston-Salem AQ), Scot Sibert (Gaston MPO), Ed Johnson (CAMPO), David McDonald (MUMPO)	<p>The purpose of the meeting was to review draft Metropolitan Transportation Improvement Program (MTIP) to verify that the draft MTIP is a subset of long-range transportation plan (LRTP) for all air quality maintenance areas.</p> <p>General Comments:</p> <p>Regarding the different mileage in the State Transportation Improvement Program (STIP) vs. LRTPs, it should be noted that the mileage in the STIP is estimated and the mileage in the LRTPs may be more accurate. All areas were asked to consult with Van Argabright on major discrepancies. Van indicated that the mileage in the STIP could be adjusted to reflect the mileage in the LRTP.</p> <p>Alex McNeil, FTA, expressed a concern that the transit portion of the STIP was not available for review at today's meeting, and may not be available for a thorough review before the STIP goes to print on May 1. It was explained that North Carolina Public Transportation Division (NCPTD) was not included in today's conformity review meeting because none of the areas had transit projects that would be subject to the conformity review process, for years 2004, and 2005. However, various staff from NCPTD was able to join several of the review sessions. Mike Kozak indicated that the transit portion of the STIP would be available around late April. The aviation piece however may not be ready. Bashad agreed to send Alex copies of the available draft MTIPs that had been approved for inclusion in the STIP.</p> <p>Commitments:</p> <p>All MPOs were asked to respond in writing by Wednesday to Bashad Norowzi with their justification for the discrepancies noted by the review team members.</p> <p>Transit portion of the STIP will be available 4/24/03. This was provided and will be included in draft conformity report review packages sent to the review agencies.</p> <p>A13 (Falls of the Neuse Blvd)- this project is regionally significant, federally funded and has not been assigned a TIP. Please explain. CAMPO will research the issue and will provide a response shortly.</p> <p>All MPOs need to consult with Van Argabright on the STIP versus LRTP discrepancy issue.</p> <p>Van Argabright will address the mileage discrepancy issues between the STIPs and LRTPs</p>	Edward J. Dancausse FHWA NC Division 4/07/03

Responses to review agency comments are provided below:

CAMPO

FHWA comments

I-4710: is not in the LRTP, why? (pavement rehabilitation: is this project not capacity adding or regionally significant?)

CAMPO response: This project is only pavement rehabilitation, and will not add capacity to a regionally significant roadway.

I-4803: is not in the LRTP, why? (pavement rehabilitation: is this project not capacity adding or regionally significant?)

CAMPO response: This project is only pavement rehabilitation, and will not add capacity to a regionally significant roadway.

I-4708: is not in the LRTP, why? (mill and overlay: is this project not capacity adding or regionally significant?)

CAMPO response: This project is only pavement rehabilitation, and will not add capacity to a regionally significant roadway.

U-4410: is not in the LRTP, why? (RTP access routes?)

CAMPO response: Louis Stephens Drive (listed as A27 in the LRP) is shown as a project extending from Research Triangle Park into the Town of Cary. George Watts Hill Drive is within the boundaries of the Research Triangle Park; with a proposed extension into the Town of Morrisville. George Watts Hill Drive was included the regional thoroughfare plan in the late 1990s, and was not considered as a part of the 2002 LRTP. Finally, neither of these roads is considered regionally significant in accordance with guidelines established by NCDOT and DAQ during the conformity process.

P-2908: is not in the LRTP, why? (Amtrak Capital and Operations Cost-Charlotte and Rocky Mount)

CAMPO response: The CAMPO Long Range Transportation Plan focused on regional transportation delivery systems such a roadway, transit, and bicycle/pedestrian facilities. Furthermore, enhancements to the rail system would occur with the construction of TTA's Phase One Regional Rail System, which may also function as a component of the Southeast High Speed Rail Corridor.

P-2918: is not in the LRTP, why? (Amtrak Operations between Charlotte/Raleigh/CY Maintenance Facility)

CAMPO response: The CAMPO Long Range Transportation Plan focused on regional transportation delivery systems such a roadway, transit, and bicycle/pedestrian facilities. Furthermore, enhancements to the rail system would occur with the construction of TTA's Phase One Regional Rail System, which may also function as a component of the Southeast High Speed Rail Corridor.

NCDENR comments:

The following projects are not in the LRTP:

I-2204 (part complete/ part under construction)

CAMPO response: Completed in Wake County

R-3600 (unfunded)

CAMPO response: This is project A235. Will correct in LRTP

R-4469 (unfunded)

CAMPO response: This is project F15 (US 64 Corridor Study)

R-2609 (unfunded)

CAMPO response: This needs to be added to LRTP in post years.

R-2635

CAMPO response: This is project F4. Will correct in LRTP.

U-3607 (unfunded)

CAMPO response: This is project A88. Will correct in LRTP

U-4703 (unfunded)

CAMPO response: This is project A138. Will correct in LRTP

U-515E (unfunded)

CAMPO response: Part of A 138. Will correct in LRTP

U-3817 (unfunded)

CAMPO response: This is project A24. Add TIP number to table.

U-4410 (part under construction)

CAMPO response: See CAMPOs response to the FHWA comments above.

Project R-2000 is in the 2005 network (i.e. open to traffic by December 31, 2005) but according to the compare report there is still construction in FY 06, please explain.

CAMPO response: 2006 monies could be spent in October 2005 through December 2005.

Ensure that Project R-2814 is not open to traffic until after 2005.

CAMPO response: 0.7 miles of road have been completed in Louisburg (Section E). Section A will be let in FFY 2004 (which are Projects A89 & A90).

The mileage differs between the LRTP and compare report for project R-2635A.

CAMPO response: LRTP mileage should match R-2635 & R2635A.

Scope differs for project U-2719.

CAMPO response: Project is F10. Switch project descriptions including mileage.

There are two different lengths in the compare report for project U-2918. The plan says 2.2 miles.

CAMPO response: Will stop at US 70 instead of Westgate Drive. Change termini.

A13 (Falls of the Neuse Blvd)- this project is regionally significant, federally funded and has not been assigned a TIP. Please explain.

CAMPO response: We are researching this issue and will provide a response shortly.

The following projects were not in the compare report. Please ensure that they are complete.

U-2582

CAMPO response: Project A23 is completed.

U-2547

CAMPO response: A4 (Rogers Lane Extension)?

U-2824

CAMPO response: Project A87 is completed

R-2425

CAMPO response: Project A89 is completed

GASTON MPO

FHWA comments

Are there were any projects in the STIP for the rural portion of Gaston County outside the MPO boundary?

Gaston MPO response: The only project outside the MPO boundary that may qualify would be R-617, widening of NC 150. However, clarification occurred that this portion within Gaston County has been completed.

NCDENR comments:

The following projects R-2608, R-3107, R-2720, U-4705, and U-3321 is in the report, but not in the MTIP.

Gaston MPO response: the projects are unfunded at this time. It was made known that if any of these projects are allocated funding by the next MTIP update, there will have to be a new conformity report done.

The following projects B-2, B-4, B-6, B-8, B-9, B-10 are regionally significant and are in the 2006-2015 project list of the LRTP.

Gaston MPO response: this is correct and that all of these projects are unfunded and in post-years at this time. B-6 may be funded through a proposed City of Gastonia Bond referendum in November 2003, but it is unknown if the referendum will pass.

GREENSBORO MPO

FHWA comments:

LRTP: R-2413: shows 12.4 miles; MTIP: R-2413: shows 13.5 miles. Why is the mileage in the MTIP and LRTP not the same?

Greensboro MPO response: The project length shown in the LRTP was measured by MPO staff and is based on City of Greensboro GIS data. The length shown in the MTIP was measured by North Carolina Department of Transportation (NCDOT) project development branch based on another source.

LRTP: U-2525: shows 6.9 miles; MTIP: U-2525: shows 15.0 miles. Why is the mileage in the MTIP and LRTP not the same?

Greensboro MPO response: The actual project length shown in the MTIP is 15.1 miles, while the actual length shown in the LRTP is 15.4 miles, consisting of map codes A16 (1.8 miles), B18 (4.8 miles), B42 (0.3 miles), and C1 (8.5 miles). The source of this difference appears to be a similar mismatch between the City of Greensboro GIS data and the NCDOT Program Development Branch's measurement source data.

LRTP: U-3612: shows 0.6 miles; MTIP: U-3612: shows 0.7 miles. Why is the mileage in the MTIP and LRTP not the same?

Greensboro MPO response: The eastern terminus of this project, previously at Alfred Drive, has been extended approximately 750 feet further east along Hilltop Road, to Adams Farm Parkway, in order to make the project coterminous with a City of Greensboro project, which extends eastward from Adams Farm Parkway. There has been a change in the project scope/description since the last LRTP update. This project is not scheduled for construction until 2006 and its completion will not happen until 2006 or later. The change in project scope should have no impact on the 2004-2010 MTIP or the existing AQ analysis. This project

scope change can be addressed and incorporated in the modeling during the next LRTP update/AQ conformity determination in 2005.

LRTP: U-4015: shows 1.6 miles; MTIP: U-4015: shows 2.0 miles. Why is the mileage in the MTIP and LRTP not the same?

Greensboro MPO response: The project length shown in the LRTP was measured by MPO staff and is based on City of Greensboro GIS data. The length shown in the MTIP was measured by NCDOT project development branch based on another source.

Is P-2908 in the LRTP?

Greensboro MPO response: This project consists of operations and capital funding for the Amtrak passenger rail service. This project is not considered regionally significant and has not been modeled, and is therefore not included in the LRTP.

Is P-2918 in the LRTP?

Greensboro MPO response: This project consists of operations funding for Amtrak passenger rail service. This project is not considered regionally significant, has not been modeled, and is therefore not included in the LRTP.

NCDENR comments:

Mileage does not match in the compare report to the LRTP for the following projects:

R-2413?

Greensboro MPO response: The project length shown in the LRTP was measured by MPO staff and is based on City of Greensboro GIS data. The length shown in the MTIP was measured by NCDOT project development branch based on another source.

U-2525?

Greensboro MPO response: The actual project length shown in the MTIP is 15.1 miles, while the actual length shown in the LRTP is 15.4 miles, consisting of map codes A16 (1.8 miles), B18 (4.8 miles), B42 (0.3 miles), and C1 (8.5 miles). The source of this difference appears to be a similar mismatch between the City of Greensboro GIS data and the NCDOT Program Development Branch's measurement source data.

U-4006?

Greensboro MPO response: There is no apparent difference in the mileage or description of this project, between the LRTP and the MTIP.

U-4015?

Greensboro MPO response: The project length shown in the LRTP was measured by MPO staff and is based on City of Greensboro GIS data. The length shown in the MTIP was measured by NCDOT project development branch based on another source.

2. The scope seems to be different in the following projects:

I-2201?

Greensboro MPO response: In the LRTP, the western terminus of this project is listed as Sandy Ridge Road, whereas in the MTIP, the terminus is listed as Squire Davis Road. At this point along Interstate 40, Sandy Ridge Road and Squire Davis Road are one in the same. In the LRTP, the eastern terminus of this

project is listed as Holden Road. The LRTP excludes the portion of this project from Holden Road eastward to Freeman Mill Road, which had been completed prior to adoption of the LRTP.

U-3612?

Greensboro MPO response: The eastern terminus of this project, previously at Alfred Drive, has been extended approximately 750 feet further east along Hilltop Road, to Adams Farm Parkway, in order to make the project coterminous with a City of Greensboro project, which extends eastward from Adams Farm Parkway. There has been a change in the project scope/description since the last LRTP update. This project is not scheduled for construction until 2006 and its completion will not happen until 2006 or later. The change in project scope should have no impact on the 2004-2010 MTIP or the existing AQ analysis. This project scope change can be addressed and incorporated in the modeling during the next LRTP update/AQ conformity determination in 2005.

The following projects were not in the compare report. Please ensure that these projects are complete and open to traffic:

U-3429?

Greensboro MPO response: This project is complete.

P-3416?

Greensboro MPO response: This project is in fact listed in the Compare Report, the MTIP and the LRTP.

HIGH POINT MPO

FHWA comments:

LRTP: R-609: shows 11.3 miles

MTIP: R-609: shows 12.9 miles

Why is the mileage in the MTIP and LRTP not the same?

High Point MPO response: The distance in the LRTP is the amount left to be built. The distance in the MTIP includes a section of 1.6 miles that is already completed.

LRTP: R-2606: shows 11.5 miles

MTIP: R-2606: shows 8.0 miles

Why is the mileage in the MTIP and LRTP not the same?

High Point MPO response: according to the State's Project Breakdown Map, the length is 11.5 miles. The mileage in the MTIP (8 miles) is not correct. The 11.5 miles in the LRTP is correct and was what was modeled for the AQ conformity determination.

The LRTP indicated that this project is not included in the conformity regional emissions analysis, why?

High Point MPO response: Part of the project is outside the MPO's area and thus is not included in the analysis.

LRTP: R-2568: shows 6.8 miles

MTIP: R-2568: shows 13.5 miles

Why is the mileage in the MTIP and LRTP not the same?

High Point MPO response: There is an additional 7.4 mile segment in the 2020 horizon year.

LRTP: U-2913: shows 4.3 miles

MTIP: U-2913: shows 4.5 miles

Why is the mileage in the MTIP and LRTP not the same?

High Point MPO response: The mileage in the MTIP (4.5 miles) is not correct. The 4.3 miles in the LRTP is correct and was what was modeled for the AQ conformity determination.

LRTP: U-3336: shows 0.3 miles

MTIP: U-3336: shows 0.5 miles

Why is the mileage in the MTIP and LRTP not the same?

High Point MPO response: The mileage in the MTIP (0.5 miles) is not correct. The 0.3 miles in the LRTP is correct and was what was modeled for the AQ conformity determination.

NCDENR comments:

The following projects are not in the LRTP:

R-2220

R-4461

R-4065

High Point MPO response: R-4461 is a new addition to the MTIP and not regionally significant. R-2220 and R-4065 are not in the High Point Urban Area. Van A. will check on this.

Mileage differs between the LRTP and compare report for the following projects:

Projects

R-2606

R-2568

U-2913

U-3336

High Point MPO response: this question was addressed above under the FHWA comment section.

Scope and/or mileage differs between LRTP and compare report for these two projects:

R-609

U-2717

High Point MPO response: R-609: The LRTP documents the correct project termini. The MTIP need to be modified. U-2717 the project distance difference between the MTIP and the LRTP is only a couple of blocks and should have no impact on AQ emissions analysis.

Projects U-2536 and U-3335 are not in the compare report are they complete?

High Point MPO response: U-2536 is complete. U-3335 will be completed this year.

Thomasville Intersection- will this project eventually be assigned a MTIP number? When it is listed in the MTIP?

High Point MPO response: yes.

A general comment about transit. Our transit info was approved by our Technical Advisory Committee (TAC) and sent to NCPTD.

DAVIDSON COUNTY (Rural portion)

FHWA comments:

R-2568 is not in the STIP, why?

High Point MPO response-R-2568 is not in the STIP for the rural portion of Davidson County because included in High Point's MTIP.

U-3336 is not in the STIP, why?

High Point MPO response-U-3336 is not in the STIP for the rural portion of Davidson County because included in High Point's MTIP.

NCDENR comments:

The following projects are not in the LRTP. Please explain. (I am assuming it is because many of them are either unfunded or not regionally significant.)

R-3602 (unfunded)

R-2568 (part under construction)

U-2537 (appears to be post-years)

U-3336 (Division Project?)

U-4411 (unfunded)

U-4420 (unfunded)

High Point MPO response-The information provided above in parenthesis is correct.

MUMPO

FHWA comments:

Could you check page 5 Table 1 and page 9 table 2. They both refer to 2002-2004 conformity years and I'm guessing it should be 2003-2004 and 2004-2005.

MUMPO response: You are correct this is an error. Table 1 & 2 have been changed to read as follows:

Table 1

MECKLENBURG-UNION METROPOLITAN PLANNING ORGANIZATION
FY 2004-2010 TRANSPORTATION IMPROVEMENT PROGRAM
(This list contains only projects within Mecklenburg County for 2004, 2005, 2006. Union County is an Attainment area.)

Table 2

LIST OF EXEMPT FUNDED PROJECTS MECKLENBURG-UNION
METROPOLITAN PLANNING ORGANIZATION
FY 2004-2010 TRANSPORTATION IMPROVEMENT PROGRAM

To satisfy State Law our Local & State TIP cover 7-years; however, only the first 3 years are recognized by USDOT and that is what is listed for conformity purposes.

Thus the TIP years we are demonstrating is a subset of the Conforming 2025 LRTP are 2004, 2005 and 2006.

In each case below the reference to the MTIP seems to really be the STIP. Since the STIP in NC is a 7-year document and since many projects cross county lines, this seems to be the reason that there are some differences in the length of projects listed.

LRTP: I-3311A: shows 8.43 miles

MTIP: I-3311: shows 14.19 miles

Why is the mileage in the MTIP and LRTP not the same?

MUMPO response: The MTIP lists I-3311A on p. 5 Table 1, which is index #220. The STIP includes the A & B portion of I-3311 which accounts for the difference in length. Only the I-3311A portion is funded and included in the first 3-years of the TIP.

LRTP: I-3803: shows 6.46 miles

MTIP: I-3803: shows 12.8 miles

Why is the mileage in the MTIP and LRTP not the same?

MUMPO response: The MTIP lists I-3803A on p. 5 Table 1, which is index #203.

The STIP includes the A & B portion of I-3803 and does not note that the project limit of I-3803A extends into Cabarrus County that is outside MUMPO and the Air Quality Maintenance Area. This explains the difference in length. Only the I-3803A portion is funded and only the portion in Mecklenburg County is included in the first 3-years of the MUMPO TIP.

LRTP: R-211: shows 0 miles

MTIP: R-211: shows 28 miles

Why is the mileage in the MTIP and LRTP not the same?

MUMPO response: All of R-211 is complete except for the Interchange with Weddington Road. The I-485/Weddington Road Interchange is all that is listed in the MTIP on p. 6, Table 1.

LRTP: R-2248: shows 18.82 miles

MTIP: R-2248: shows 28 miles

Why is the mileage in the MTIP and LRTP not the same?

MUMPO response: R-2248 is broken into two sections in the LRTP. Index #207 & 242 together make up R-2248. The MTIP includes both sections in the first 3-years. See p. 6, Table 1.

LRTP: R-2420: shows 0.69 miles

MTIP: R-2420: shows 2.1 miles

Why is the mileage in the MTIP and LRTP not the same?

MUMPO response: R-2420 is broken into 3 sections. R-2420A is beyond 2010 and is not included in the MTIP. R-2420B was completed during the FY 2002-2008 TIP and is listed in Table 3 on p. 15 of the TIP Conformity Report. R-2420C is included in the MTIP on p. 5, Table 1 of the TIP Conformity Report. This explains the difference in lengths listed.

LRTP: U-2507: shows 2.34 miles

MTIP: U2507: shows 4.1 miles

Why is the mileage in the MTIP and LRTP not the same?

MUMPO response: U-2507 is broken into 2 sections. U-2507B was completed many years ago in a previous TIP. Only U-2507A remains and is included in the MTIP. This explains the difference in project lengths.

LRTP: U-2704: shows 0 miles

MTIP: U-2704: shows 0.8 miles

Why is the mileage in the MTIP and LRTP not the same?

MUMPO response: The LRTP lists 2 projects (one State, Index 221 & one City, Index 9) that together with previous projects allow the grade separated US 521 & US 74 to act as an interchange. The LRTP does not list the length of ramps in the construction of an interchange.

NCDENR comments:

Index 7 in TIP: Error in Total Cost Column

MUMPO response: The project cost is \$5.2 million and this error has been corrected.

I did not see the following TIP projects in the LRTP, please explain?

MUMPO response: All of these projects are included in the LRTP. The page, table, and location are included after each comment below.

Index 71 (NC 27/ Freedom Drive)

MUMPO response: p. 5-7, Table 5-1, 1st line

Index 131/ U-3321 (Garden Parkway)

MUMPO response: p. 5-11, Table 5-2, 5th from top, called West Blvd Ext in LRTP

Index 210/ R-3329 (US 74- new route)

MUMPO response: p. 5-10, Table 5-2, 4th from top

Index 307/ U-4401 (Reedy Creek Rd)

MUMPO response: p. 5-6, Table 5-1, 19th from bottom

Index 434 (Davidson/ Matheson Connector)

MUMPO response: p. 5-7, Table 5-1, 10th from bottom

Index 437 (Archdale Drive)

MUMPO response: p. 5-7, Table 5-1, 13th from bottom

Index 439 (NC 27/ Mt. Holly Rd)

MUMPO response: Index 439 is incorrect. Correct Index # is 432 and has been changed on Table 1, page 7 of the TIP Conformity Report. p. 5-7, Table 5-1, 2nd from top

The following LRTP projects are not in the MTIP, I am assuming that they are post-years to this MTIP. Please confirm. Index 35 (or is this contained in Index 202?)

MUMPO response: A portion of the southbound HOV lanes will be completed with I-3311A, Index 202. The remainder of Index 35 is beyond FFY 2006.

Index 51

MUMPO response: Beyond FFY 2006

Index 147

MUMPO response: Beyond FFY 2006

Index 148

MUMPO response: Beyond FFY 2006

Index 161

MUMPO response: Beyond FFY 2006

Index 133

MUMPO response: Beyond FFY 2006

Index 192

MUMPO response: Beyond FFY 2006

Index 243

MUMPO response: Beyond FFY 2006

Index 149

MUMPO response: Beyond FFY 2006

Index 171

MUMPO response: Beyond FFY 2006

Index 150

MUMPO response: Beyond FFY 2006

Index 15

MUMPO response: Beyond FFY 2006

Index 10

MUMPO response: Beyond FFY 2006

Index 85

MUMPO response: Beyond FFY 2006

Index 705

MUMPO response: Included in MTIP Conformity Report on p. 10, Table 2

Index 411

MUMPO response: Completed in previous MTIP. Listed on p. 16 Table 3 of TIP Conformity Report

Index 410

MUMPO response: Completed in previous MTIP. Listed on p. 16 Table 3

Index 413

MUMPO response: Included in MTIP Conformity Report on p. 9, Table 2

Index 227

MUMPO response: Completed by Developer in previous TIP. Added to p. 15, Table 3 of MTIP Conformity Report.

Index 119

MUMPO response: Included in MTIP Conformity Report on p. 9, Table 2

WINSTON SALEM FORSYTH (WSF) MPO

FHWA comments

LRTP: R-2568: shows 3.7 miles, MTIP: R-2568: shows 13.5 miles

Why is the mileage in the MTIP and LRTP not the same?

WSF MPO response: R-2568, Thomasville Road, 3.7 miles of the project is our portion in Forsyth County.

LRTP: R-2247: shows 13.3 miles, MTIP: R-2247: shows 14.8 miles

Why is the mileage in the MTIP and LRTP not the same?

WSF MPO response: The mileage for R-2247, the Northern Beltway, was not correctly recorded in the revisions made to the May 2002 update of the LRTP. The correct mileage is 14.8 miles.

LRTP: U-2826: shows 6.1 miles, MTIP: U-2826: shows 12.0 miles

Why is the mileage in the MTIP and LRTP not the same?

WSF MPO response: U-2826, US 52, is listed in multiple timeframes in the LRTP, the total mileage for the project is 2.0 miles. Two short-range projects totaling 6.1 miles are a subset of the future long-range improvements

LRTP: U-2827: shows 6.9 miles, MTIP: U-2827: shows 7.8 miles

Why is the mileage in the MTIP and LRTP not the same?

WSF MPO response: U-2827, US 421/Business 40, is listed in multiple timeframes and phases in the LRTP. The mileage discrepancy arises from NCDOT and the MPO using different sources of mileage data.

U-2925 is not in the LRTP, why?

WSF MPO response: U-2925, Salem Creek Connector, was formerly called the

Diggs Boulevard project (B15 in the LRTP). The scope of U-2925 has been expanded to include the section from Vargrave Street to Salem Avenue (C21 in the LRTP) for planning purposes.

NCDENR comments

Many projects have the same scope, but very different lengths as compared to the plan. Please explain.

MTIP Number	Compare Mileage	Plan Mileage
I-911	7.1	
R-3441	21.3	
R-2577	18.8	
R-2568	13.5	
R-2247	14.8	
U-3119	2.5	(two parts)
U-3617	2.8	
U-2925	1.0	

WSF MPO response: Many of these projects are partially located in Forsyth County. The LRTP reflects only our portion of the total MTIP project mileage. This is true for I-911, R-3441, R-2577, R-2568, and U-3617. In revisions made during the 2002 update of the LRTP, R-2247 was listed with the incorrect mileage, 14.8 miles is correct. The LRTP uses 2.8 miles for U-3119, the MTIP shows 2.5 miles which reflects different data sources. U-2925, Salem Creek Connector, was formerly called the Diggs Boulevard project (B15 in the LRTP). The scope of U-2925 was been expanded to include the section from Vargrave Street to Salem Avenue (C21 in the LRTP) for planning purposes.

In the compare report two difference lengths are listed for Project U-2579. 9.5 miles matches what is recorded in the LRTP. Please verify. How does U-2579AA differ from U-2579?

WSF MPO response: U-2579, Northern Beltway (Future I-74), has a new description of the project limits to include all portions of the project eligible for Highway Trust Fund dollars – US 52 to Interstate 40. U2579AA is the portion of the Northern Beltway (Future I-74) from Interstate 40 to US 311, it is listed as unfunded and Post-Years in the MTIP. These projects are listed in the LRTP as B8 and B18.

Projects U-2826 and U-2827 have multi-parts in the LRTP. I can't get the mileage or scopes to match up exactly. Please explain.

WSF MPO response: U-2826, US 52, is listed in multiple timeframes in the LRTP, the total mileage for the project is 12.0 miles. Two short-range projects totaling 6.1 miles are a subset of the future long-range improvements U-2827, US 421/Business 40, is listed in multiple timeframes and phases in the LRTP. The mileage discrepancy arises from NCDOT and the MPO using different sources of mileage data.

The scope differs between LRTP and compare report for Project U-4413.

WSF MPO response: The scope of U-4413, Broad Street, was changed in the 2002 TIP from Wachovia Street to Brookstown Avenue to from Wachovia Street to Second Street. The MPO will revise our documents to reflect that change.

I assume the following projects are complete as they are in the LRTP to be opened by 2004 and yet are not listed in the compare report. Please verify.

R-2709 (NC 150)

R-2712 (US 311)

R-4072 (Newsome Road)

U-3832 (Waughtown Street Realignment)

W-4007 (Silas Creek Parkway)

WSF MPO response: R-2709, R-2712, R-4072 and U-3832 are complete. W-4007 is still listed in the MTIP.

I did not find the following projects in the compare report. Please explain...

U-2579A (Northern Beltway)

U-4021 (Service road parallel to US 421)

WSF MPO response: U-2579A, Northern Beltway East, was discussed in Questions 2 and 3. U-4021, Service Road parallel to US 421/Business 40, is referenced in U-2827 as a part of the resurfacing project.

I am assuming work on the following projects in the 2005-2014 LRTP project list is scheduled to be assigned STIP numbers in post-years to this MTIP cycle.

B36 (E. Mountain St/N. Main St Connector)

B37 (N. Main St./Piney Grove Rd Connector)

B48 (Business I-40 Interchange at Big Mill Farm Rd)

WSF MPO response: B36 and B37 are parts of the Kernersville Northern Loop. A feasibility study is complete on B36. B37 is to be constructed with local Kernersville bond funds. Both projects are listed as priorities 1A and 1B in the Winston-Salem Urban Area transportation needs report, the MPOs document requesting project funding through the MTIP. B-48, Big Mill Farm Road interchange with Business 40, has been studied and is waiting for the Northern Beltway interchange plans with Business 40 to insure compatible interchange design and spacing. Big Mill Farm Road interchange is listed as priority 10A in the transportation needs report.

Appendix D

Insert 2004-2010 Metropolitan Transportation Improvement Program